

Mitigation Partners

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Life Death

Mitigation
Balancing the
Scales of Justice

Toni Knox, LCSW
Licensed Clinical
Social Worker

October 27, 2008

Mr. James W. Volberding
Attorney & Counselors at Law
110 North College Avenue
Suite 1850
Tyler, Texas 75702

Re: Danielle Simpson

Dear Wes:

Attached you will find my second invoice in the amount of \$3,999.68 . I would request that additional funds be authorized to complete the social history and possibly interview some final witnesses as described below.

Since the last allocation of funds there have been several trips to Palestine and the surrounding area. Additionally there have been several more interviews with family members, teachers and people with knowledge of Danielle's history. I also made a trip to Livingston to visit with Danielle on October 14, 2008 at the Polunsky Unit. As expected, there have been several hours spent documenting the results of all of the recent activity which is being forwarded to your office for review.

At present there remain several people who are candidates to be interviewed. However, the scope of their knowledge concerning Danielle is unknown and the reason for interviewing them is based on their reported history with Danielle or because we have been referred to them by other people we have interviewed. Below is a list of potential candidates for interview and their connection to Danielle.

Remaining Potential Interviewees

Reverend John McKnight and wife- they are reported to have known Danielle most of his life. He is affiliated with The Church of the Living God in Crockett, TX.

Linda Hornbuckle- she was a youth minister at grace Temple Church and was referred by both Pastor Crosby and Rev. Preston White as someone who had a

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lot of contact with Danielle. There have been attempts to contact her however she was not at home.

Billy Carwell- he was referred by DeWayne Simpson, Danielle's cousin. He and his wife lived next door to Danielle's family for several years. He is reported to still live in the Palestine area.

Ashley Gibson- she is a former girlfriend of Danielle. The extent of her knowledge is unknown. She is reported to live in Tyler.

Dora Estell- she is a teacher in the Grapeland School District that is reported to have taught Danielle.

Dion Birks- a teacher in the Grapeland School District that is reported to have taught Danielle.

Rodney Stephens- a classmate of Danielle when he attended Westwood High School.

Gerald Turner- a classmate of Danielle when he attended Westwood High School.

I have no way of telling if the above people can be located and interviewed. I believe that most of the important people in Danielle's life have been interviewed. The only way to find out if the above witnesses have important information is to actually get in front of them in an interview.

If you still believe that my testimony will be beneficial, additional funds will be necessary for time and travel.

Please let me know as soon as possible if you want me to continue to pursue the interviews.

Sincerely,

A handwritten signature in cursive script that reads "Toni".

Toni Knox

Mitigation Partners

2200 Shannon Lane
Richardson, Texas 75082
(214) 415-6753

DATE	INVOICE #
10/27/2008	132

BILL TO

James W. Volberding
110 N. College Ave.
Suite 1850
Tyler, Texas 75702

CASE REFERENCE

D. Simpson

ITEM	DESCRIPTION	AMOUNT
Hours	Mitigation Hours - includes interviews, documentation and travel time. (Breakdown of Hours Attached)	3,848.75
Expenses	Expenses (Includes hotels, database searches)	150.93
Total		3,999.68

<u>Description of Task</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Travel Time - Dallas/Livingston/Dallas	10/13/08	4.5	\$50.00	\$225.00
Interview/Documentation - DS, TC DH	10/14/08	5	\$75.00	\$375.00
Research for Guards	10/20/08	1.5	\$75.00	\$112.50
Documentation for Attorney/Expert	10/21/08	1.75	\$75.00	\$131.25
Travel - Dallas/Palestine	10/21/08	4.5	\$50.00	\$225.00
Interviews (JB, CH, JN, CD, KS, BS)	10/21/08	7	\$75.00	\$525.00
Social History Documentation	10/22/08	4	\$75.00	\$300.00
Travel - Palestine/Dallas	10/22/08	4.5	\$50.00	\$225.00
Interviews (RO, BF, JS)	10/22/08	5	\$75.00	\$375.00
Documentation - Palestine Interviews social history	10/23/08	5	\$75.00	\$375.00
Social History Documentation	10/24/08	3.4	\$75.00	\$255.00
Travel - Dallas/Palestine/Dallas	10/25/08	5.5	\$50.00	\$275.00
Interviews (DS, RW, BJ,GM)	10/25/08	4.5	\$75.00	\$337.50
Documentation	10/26/08	1.5	\$75.00	\$112.50
Total Hours		57.65		\$3,848.75
Expenses				\$150.93
Total Hours and Expenses				\$3,999.68

Danielle Simpson

Hotel - Livingston	10/13/08	\$54.78
(2 Cases = 1/2 room of \$109.56)		
Database searches	10/20/08	\$14.00
Hotel - Palestine	10/21/08	\$71.15
Database searches	10/21/08	\$7.00
Database searches	10/22/08	\$4.00

Total**\$150.93**